

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS
ANTITRUST LITIGATION : Master File No. 2:12-md-02311
: Judge Marianne O. Battani
: Special Master Gene J. Esshaki

ALL PARTS : :

THIS DOCUMENT RELATES TO: :
ALL ACTIONS :

END-PAYOR PLAINTIFFS' MOTION FOR EXTENSION OF PAGES

Pursuant to Local Rule 7.1(d)(3), End-Payor Plaintiffs respectfully request that the Court grant them leave to file the Parties’¹ Response to Objections to the Special Master’s Order Regarding the Parties’ Motion to Compel Discovery From Non-Party OEMs and Ordering Non-Party Rule 30(b)(6) Depositions (“Response”) of no more than 54 pages, including signatures.

In support of this motion for extension of pages, the Parties state that the Response collectively addresses the following sets of objections filed:

- (1) Certain SSEs' Objections to the Special Master's Order Regarding the Parties' Motion to Compel Discovery From Non-Party OEMs and Ordering Non-Party Rule 30(b)(6) Depositions (ECF No. 1316);
 - (2) Nonparty Domestic Distributors and Non-Core SSE's Objections to and Motion to Modify Special Master's Order Regarding the Parties' Motion to Compel Discovery From Non-Party OEMs and Ordering Non-Party Rule 30(b)(6) Depositions (ECF No. 1328);

¹ “Parties” collectively refer to End-Payor Plaintiffs, Automobile Dealer Plaintiffs (“ADPs”), Truck and Equipment Dealer Plaintiffs, the State of Indiana, the State of Florida, and all Defendants in this multidistrict litigation. ADPs do not join the statements set forth in the Response to Objections to the Special Master’s Order Regarding the Parties’ Motion to Compel Discovery From Non-Party OEMs and Ordering Non-Party Rule 30(b)(6) Depositions but concur in the result sought.

- (3) Non-Party Daimler Entities' Joinder (ECF No. 1329);
- (4) Non-Party Daimler Truck Entities' Objections to, and Motion to Modify, Special Master's April 20, 2016 Order (ECF No. 1318);
- (5) General Motors' Separate Statement Regarding Objections to the Special Master's Order Regarding the Parties' Motion to Compel Discovery From Non-Party OEMs and Ordering Non-Party Rule 30(b)(6) Depositions (ECF No. 1327);
- (6) Non-Party Hyundai Motor Manufacturing Alabama, LLC's Objections to, and Motion to Modify, the Special Master's Order Regarding Non-Party Rule 30(b)(6) Depositions and Failure to Recognize Hyundai Motor Manufacturing Alabama as a Smaller SSE (ECF No. 1320);
- (7) Non-Party Kia Motors Manufacturing Georgia, Inc.'s Separately Filed Objections to Special Master's Order Regarding the Parties' Motion to Compel Discovery From Non-Party OEMs and Ordering Non-Party OEM Rule 30(b)(6) Depositions (ECF No. 1321); and
- (8) Honda's Separate Statement Regarding Objections to the Special Master's Order Regarding the Parties' Motion to Compel Discovery From Non-Party OEMs and Ordering Non-Party Rule 30(b)(6) Depositions; and
- (9) Nissan Entities' Joinder in Objection Filed by Certain SSEs (ECF No. 1315).

WHEREFORE, the Parties respectfully request that the Court grant them leave to file the Parties' Response of no more than 54 pages, including signatures.

Date: May 16, 2016

Respectfully submitted,

/s/ Steven N. Williams

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CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2016 I caused the foregoing END-PAYOR PLAINTIFFS' MOTION FOR EXTENSION OF PAGES to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Steven N. Williams

Steven N. Williams